



U.S. Department of Justice

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December 10, 2020

FILED ON ECF WITHOUT ENCLOSURES
VIA USAFx

Matthew Thompson, Esq.
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Re: United States v. Gregg A. Bigda
Crim. No. 18-CR-30051-MGM

Dear Counsel:

Please find enclosed discovery in the above-referenced case labeled with Bates numbers US015672 through US016415.

Included in this production, among other things, is a video of the interrogations containing written captions scrolling at the bottom of the video, and a written transcript of those captions in pdf format. Also included are several clips of the longer recordings. The recordings in this production are clips and compilations of videos that we have already produced in discovery.

While the government is not obligated to produce a copy of its exhibits to the defense until one week in advance of trial, the government is providing early notice that it will seek to introduce these recordings, including the captioned video, at trial as exhibits. We are making this early production in an effort to give the defense an opportunity to review the clips, captions, and transcript, so that the parties may resolve any dispute about them well in advance of trial. If you have any disagreement with the government's transcription, please let us know of any proposed changes so that we can come to an agreement on the content of transcript and captions, or bring any dispute to the Court for resolution by January 21, 2021, which is six weeks from the date of this letter.

We have also produced via USAFx a word-searchable production log of all discovery produced to date. If you have any questions, please do not hesitate to call the undersigned Assistant U.S. Attorney.

Very truly yours,

ANDREW E. LELLING
United States Attorney

By: /s/ Deepika Bains Shukla
DEEPIKA BAINS SHUKLA
Assistant U.S. Attorney

Enclosures